



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

November 18, 1998

REPLY TO THE ATTENTION OF:
DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Tuma
Ford Motor Company
Ohio Assembly Plant
650 Miller Road
Avon Lake, Ohio 44012

Re: Compliance Evaluation Inspection
Ford Motor Company
OHD 020 626 669

Dear Mr. Tuma:

On August 5, 1998, your facility located in Avon Lake, Ohio was inspected by representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA). The purpose of the inspection was to evaluate compliance with applicable standards of the Resource Conservation and Recovery Act (RCRA) for generators of hazardous waste.

Based on this inspection U.S. EPA has determined that Ford Motor Company has violated the following requirements:

Whenever a hazardous waste is in a tank each closure device must be secured in closed position, 40 CFR 265.1085(c)(3);

No determination of the Maximum Organic Vapor Pressure at the time of the inspection, 40 CFR 265.1085(c)(1); and

Air emission standards for equipment leaks, 40 CFR 265 Subpart BB.

Ford Motor Company must rectify these violations and prevent any future violations of this sort. A written response detailing how these violations will be corrected and prevented in the future is necessary to resolve this matter.

Issuance of this correspondence does not preclude U.S. EPA from bringing further enforcement actions pursuant to sections 3008(a) and 7003 of RCRA, 42 U.S.C. sections 6928(a) and 6973, other statutory authority, or the assessment of a civil penalty for any past or current violation.

Attached is the report from this inspection. Should you have any questions regarding this violation, please contact Michael Beedle of my staff at (312)353-7922.

Sincerely yours,

ORIGINAL SIGNED BY
GEORGE J. HAMPER

George J. Hamper, Chief
Minnesota/Ohio Section
Enforcement & Compliance Assurance Branch

cc: Robert Almquist, OEPA NEDO
Cris Prosser, OEPA NEDO

U.S. EPA
INSPECTION REPORT

Facility:
Ford Motor Company
Ohio Assembly Plant
OHD 020 626 669

Date: August 1998

Subject: Compliance Evaluation Inspection

From: Michael Beedle
MN/OH Section
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

To: George Hamper
Section Chief
MN/OH Section
Waste, Pesticides and Toxics Division

On August 5, 1998, U.S. EPA performed a compliance evaluation inspection at Ford Motor Company (Facility). The Purpose of the inspection was to determine the Facility's compliance with applicable hazardous waste regulations.

INSPECTION REPORT

1 Facility Information
Ford Motor Company
Ohio Assembly Plant
650 Miller Road
Avon Lake, Ohio 44012

2 Date of Inspection
August 5, 1998

3 Participants
Michael Beedle, U.S. EPA
Cris Prosser, Ohio Environmental Protection Agency (OEPA)
Robert Almquist, OEPA

Robert Tuma, Environmental Control Engineer, Ford

4 Facility Description
The facility produces motor vehicles specifically the Ford Club Wagon/Econoline, Mercury Villager, and Nissan Quest. The major hazardous waste streams are from paint operations.

5 Summary of the Inspection

OEPA was the lead on this joint inspection. OEPA was inspecting the general compliance with RCRA Large Quantity Generator regulations. U.S. EPA focused on RCRA Air Emission Standards for Equipment Leaks (40 Code of Federal Regulations (CFR) 265 Subpart BB) and Air Emission Standards for Tanks and Containers (40 CFR 265 Subpart CC). OEPA and U.S. EPA inspectors reviewed the company documents including manifests, Contingency Plan, Training Records, weekly inspection logs, and tank installation records. Records for BB and CC compliance were requested but were not provided at the time of the inspection. The inspectors were then lead on a walk-through of the plant by Mr Tuma. The following waste management practice were observed: satellite accumulation areas, the drum storage area, waste tanks and ancillary equipment.

The following general violations were noted:

- satellite accumulation areas - numerous drums in one area

- drum storage - 2 drums stored longer than 90 days, 4 drums without labels (state lead)

- tank storage - both underground hazardous waste storage tanks were open and no available documentation of CC maximum organic vapor pressure determination

- no records of Subpart BB compliance program

6 Exit Interview

The U.S. EPA exit interview summarized the compliance issues of the open tanks, no maximum organic vapor determination, and no Subpart BB compliance program. The following information was requested: maximum organic vapor determinations for the two tanks, drawings of the pipe and equipment that drain into the two tanks, and information regarding BB compliance.

7 Inspection Follow-up

The U.S. EPA received a letter dated August 21, 1998, signed by Theodore Sharber, Plant Engineering Manager, from Ford (see Attachment A). This letter responded to the request for drawings, tank level 1 determination, and container management methods.

The maximum organic vapor pressure documentation provided was derived from another Ford facility that reportedly uses similar materials. The documentation is not dated.

U.S. EPA called Mr. Tuma on September 1, 1998, leaving a message on a phone answering system, which questioned the existence of compliance program for Subpart BB regulations. Mr. Tuma faxed a reply on September 21, 1998, stating that Ford determined the waste solvent:

"the waste itself... may likely be "in light liquid service". Thus any valves, pumps, or open-ended lines that manage this material after it has left the production area where it is generated, would be subject to the marking, monitoring and recordkeeping requirements of Subpart BB." See Attachment B.

From this information, observations made at the plant, and a review of the Ford's documents and drawings, U.S. EPA concludes that Ford is subject to Subpart BB and is not complying with these regulations.

ATTACHMENTS

- A. August 21, 1998, letter from Ford to U.S. EPA.
- B. September 21, 1998, fax from Ford to U.S. EPA.

ATTACHMENT A

August 21, 1998 Letter



Body and Assembly Division
Ohio Truck Plant

Ohio Truck Plant
650 Miller Road
Avon Lake, Ohio 44012

August 21, 1998

Mr. Michael Beedle
U.S. EPA Region 5, RCRA Enforcement
77 W. Jackson DRE-9J
Chicago, Illinois 60604

Re: Ford Ohio Assembly Plant Compliance with RCRA Organic Air Emissions Standards

Dear Mr. Beedle:

I am forwarding information that you requested from Bob Tuma regarding compliance with RCRA Subparts BB and CC. Bob is currently on vacation but will be returning to the plant on August 31, 1998. The following information is enclosed:

- Drawings of the surface coating solvent recovery system
- Analytical data supporting Tank Level 1 Control determination for purge solvent storage tanks
- Container Management Methods

Solvent Recovery System Drawings

Drawing No. 52 ZF 556, sheets 78, 134, and 147-155 are attached per your request.

Solvent Recovery Tanks Level 1 Determination

Waste Vapor Pressure Documentation forms for the two solvent recovery tanks and associated laboratory results are attached for your review. Ford analyzed candidate waste streams at its US facilities while RCRA Subpart CC was going through the rules promulgation process. Knowledge of waste has been applied to waste streams from Ford paint shops based on the initial sampling and analysis program. This is appropriate given that similar materials (and suppliers) are used in all of Ford's surface coating operations.

Container Management Methods

RCRA waste streams managed in containers that are subject to Subpart CC requirements (500 ppmw VO or greater) are managed in containers that meet DOT specifications for Packagings (49 CFR 178) for the particular material being handled. These containers are kept closed unless waste is being transferred and are inspected for visible cracks, holes, gaps, or other open spaces into the interior of the container during the routine completion of RCRA log sheets.

I trust that this information meets your needs. Bob Tuma will contact you the week of August 31 to verify that you received this information and that it meets your needs. If you have any questions regarding this information that you wish to be answered prior to August 31 please contact Bob Niemi (Ford Vehicle Operations - Dearborn, MI) at (313) 594-3063. Bob Tuma can be reached at (440) 933-1379 and I can be reached at (440) 933-1347.

Sincerely,

A handwritten signature in black ink, appearing to read 'Theodore Sharber', written in a cursive style.

Theodore Sharber, P.E.
Plant Engineering Manager

**Ohio Assembly Plant
Waste Vapor Pressure Documentation for
RCRA Subpart CC Tank Level I Control Determination**

Tank Identification: 001

Waste Stream Description: Waste Solvent

Tank Size: 12,000 gallons

Vapor Pressure: 0.6 psi

The vapor pressure for the waste stream identified above was determined using previous sampling and process knowledge.

The waste stream in Tank 3: Painting Operations (tank identification) at the Wixom Assembly Plant was sampled consistent with procedures outlined in 40 CFR 265.1084 "Waste determination procedures." Method 25E in 40 CFR part 60 appendix A was used to analyze the samples and compute the maximum organic vapor pressure of the hazardous waste. A table summarizing the sampling and analysis results is attached for reference.

Both the analyzed waste steam and the waste stream identified in this determination are generated from similar processes and therefore have similar physical properties including maximum organic vapor pressure.

The table below summarizes the tank design volume and vapor pressure cutoffs applicable to Level I controls. Waste streams managed in tanks which exceed this vapor pressure must apply Level II controls.

Tank Volume, Gallons/m3	Level I Control Cutoff Vapor Pressure, psi/inHg/kPa
>40,000/151	<0.75/1.53/5.2
20,000-40,000/75-151	<4.0/8.15/27.6
<20,000/75	<11.1/22.6/76.6

ATTACHMENT B

September 21, 1998 Fax



Vehicle Operations
Body and Assembly Division

Ohio Assembly Plant
650 Miller Road
Avon Lake, Ohio 44012

Mr. Michael Beedle -
U.S. EPA Region 5, RCRA Enforcement
77 W. Jackson DRE-9J
Chicago, Illinois 60604-3590

Re: Ford Ohio Assembly Plant - EPA ID No. OHD 020 626 669
Compliance with RCRA Organic Air Emission Standards (BB/CC)

Dear Mr. Beedle:

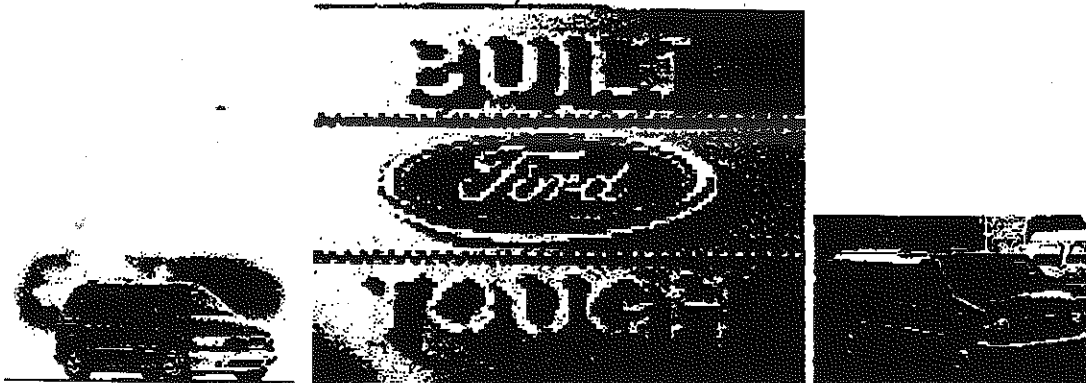
In response to your telephone call of September 1, 1998, I am including additional information to supplement the information provided with Mr. Ted Sharber's letter of August 21, 1998. With that letter, we provided drawings of the solvent recovery system in use at Ohio Assembly, as well as information supporting the Level 1 control determination for the purge solvent tanks.

In response to your request to determine if the waste solvent is "in light liquid service", we have examined the vapor pressures of the individual pure components to determine if those with a vapor pressure greater than 0.3 kPa (2.2 mm Hg) make up more than 20% of the waste. We have determined that since xylene makes up approximately 50% of our purge solvent (before use) and since its vapor pressure at 20 °C is approximately 5 mm Hg, the waste itself (once the solvent is spent and contains various waste paints) may likely be "in light liquid service". Thus, any valves, pumps or open-ended lines that manage this material after it has left the production area where it is generated, would be subject to the marking, monitoring and recordkeeping requirements of Subpart BB.

Subpart BB is not applicable to the valves or open ended lines in the paint mix room. The process generating the waste in this case is the blending and mixing of paint. The valves used are process equipment in the paint mix room production area and the cleaning solvent is not a waste until it leaves this area. Since the material processed by the pumps and valves is not classified as a waste, Subpart BB requirements do not apply.

If you have any questions regarding this information, please call me.

Bob Tuma
Environmental Control Engineer



OHIO ASSEMBLY PLANT
FORD MOTOR COMPANY
650 Miller Road
Avon Lake, Ohio 44012
Plant Engineering Department

From: Bob Tuma		Profs ID: RTUMA
Environmental Control Engineer		
Phone # (440) 933-1379	Fax # (440) 933-1571	
Dail Net: 8-282-1379	Dial Net: 8-282-1571	

To: MR. MIKE BEEDLE	
Phone #: 312-353-7922	Fax #: 312-353-4342

Number of pages to follow: 1

Comments:
RCRA ORGANIC AIR EMISSION STANDARDS
(BB/CC)